

METCAD

Public Safety Through Quality Service

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FEB 2 2 2005

February 14, 2005

FCC - MAILROOM

Ms. Marlene Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

RE: <u>WT Docket 94-102</u>

Dear Ms. Dortch:

I am writing this letter on behalf of my agency, Metropolitan Computer Aided Dispatch (METCAD) 9-1-1, in support of the recent supplemental filing by the Association of Public-Safety Communications Officials-International, Inc. reference the "Request for Declaratory Ruling" filed October 6, 2004. METCAD is a multi-jurisdictional multi-agency 9-1-1 Emergency Communications Center serving Champaign County, Illinois including the University of Illinois Urbana-Champaign Campus.

We have been receiving wireless 9-1-1 calls since 1989 when cellular service began in our area. We implemented Wireless 9-1-1 Phase I in February of 2004 and are currently working on implementing Phase II. The ability to use the latest technology to locate callers with Phase II accuracy is a substantial component to the safety of the citizens in Champaign County.

When we began receiving Wireless Phase I calls we made every carrier test every site and every sector. When we request Phase II service we again plan to require that every sector on every site that we are receiving calls from be tested. During the drive testing we will compare the location information between our mapping program and the tester's data. When we find a problem with a sector, the carrier will be required to implement a repair and then retest.

The METCAD Policy Board made the commitment to employ the latest technology that would allow us to locate our citizens at times of their most urgent needs. This equipment was very expensive, but we felt the cost would be justified to meet the

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expectations of the public who are generally of the impression that we know exactly where they are when they dial 9-1-1 whether it is from their home or from their car.

Illinois is a very large state with huge variations in population density. To base the accuracy requirements for wireless 9-1-1 over the entire state will negatively impact the areas with the highest call volume and the greatest dependency on wireless access for emergency services. If we don't require the carriers to determine their accuracy in our highly urbanized and populated areas at the PSAP level, we will be compromising our ability to find our citizens when they need it the most.

I urge you to fully consider the recent supplemental filing by the Association of Public-Safety Communications Officials-International, Inc. on this matter. Public safety depends on it.

Sincerely,

Gregory T. Abbott 9-1-1 Coordinator